

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Donald Sanders,

Civil File No. 17-cv-5106-ECT-KMM

Plaintiff,

v.

**PLAINTIFF’S EXHIBIT LIST**

BNSF Railway Company,

Defendant.

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<b>Presiding Judge</b>	<b>Plaintiff’s Attorneys</b>	<b>Defendant’s Attorneys</b>
The Honorable Eric C. Tostrud	James H. Kaster Lucas J. Kaster	Tracey Holmes Donesky Sally J. Ferguson
<b>Trial Dates</b>	<b>Court Reporter</b>	<b>Courtroom Deputy</b>
December 6 – 17, 2021	Tim Willette	Rachael Morton

Plaintiff Donald Sanders respectfully submits the following list of exhibits which he may use at the trial of this matter. Plaintiff reserves the right to amend this exhibit list prior to trial and at trial itself based upon Defendant’s exhibit list, based upon the Court’s rulings before and during trial, based upon the witnesses and/or evidence presented at trial, in order to impeach witnesses or to refresh recollection, and for such other good cause as may be determined by the Court. Plaintiff also reserves the right to object to the admissibility of documents that may be offered by Defendant at the trial, irrespective of whether the document is identified on the exhibit list.

Plf. No.	Date Offered	Marked	Admitted	Description	Beg. Bates No.	Objection
P001				2002-12-01 Collective Bargaining Agreement between BNSF and BMWED	BNSF_Sanders0002 507	
P002				2011-05-09 Safety Issue Resolution Process Reinforces Employee Safety	BNSF_Sanders0002 896	
P003				2012-07-01 Supplemental Sickness Benefit Plan - BMWED	BNSF_Sanders0002 215	
P004				2013-01-28 Track Inspector Evaluation Form	BNSF_Sanders0005 938	
P005				2013-02-01 Policy for Employee Performance Accountability	BNSF_Sanders0002 751	
P006				2013-02-21 Track Inspector Evaluation Form	BNSF_Sanders0005 953	
P007				2013-03-13 Track Inspector Evaluation Form	BNSF_Sanders0005 968	
P008				2013-10-09 Track Inspector Evaluation Form	BNSF_Sanders0005 983	
P009				2013-11-14 Track Inspector Evaluation Form	BNSF_Sanders0005 994	
P010				2013-12-26 Track Inspector Evaluation Form	BNSF_Sanders0006 005	
P011				2014-01-07 Track Inspector Evaluation Form	BNSF_Sanders0006 016	
P012				2014-02-12 Email regarding Don Sanders	BNSF_Sanders0008 132	
P013				2014-03-25 Track Safety Standards - Party 213	BNSF_Sanders0003 374	
P014				2014-12-31 Engineering Scorecard for RDM-SUPERIOR	BNSF_Sanders0007 620	Relevance
P015				2014-12-31 Engineering Scorecard for TWCEW	BNSF_Sanders0007 608	Relevance
P016				2015-01-01 Performance and Development Review for Blaine Nicole Hoppenrath - 2015 - Mid-Year	BNSF_Sanders0013 060	Hearsay Relevance

P017				2015-01-01 Performance and Development Review for Blaine Nicole Hoppenrath - 2015 - Year-End	BNSF_Sanders0013067	Hearsay Relevance
P018				2015-01-01 Performance and Development Review for Keith D Jones - 2015 - Mid-Year	BNSF_Sanders0013091	Hearsay Relevance
P019				2015-01-01 Performance and Development Review for Keith D Jones - 2015 - Year-End	BNSF_Sanders0013098	Hearsay Relevance
P020				2015-01-01 Performance Management Process Presentation	BNSF_Sanders0013116	
P021				2015-01-01 Sanders PARS Time (1/1/2015 - 4/29/2016)	BNSF_Sanders0007799	
P022				2015-01-01 Sanders Time Payroll Data (1/1/2015 - 3/28/2016)	BNSF_Sanders0007639	
P023				2015-01-05 Corporate Policy Equal Employment Opportunity, Anti-Discrimination and Harassment Policy	BNSF_Sanders0006092	
P024				2015-03-27 Engineering Scorecard Metric Dictionary	BNSF_Sanders0011158	Relevance
P025				2015-09-18 Internal Control Plan	BNSF_Sanders0002762	
P026				2015-10-09 Email chain regarding safety concern expectations	SANDERS0000169	
P027				2015-10-09 St. Paul Roadmaster Expectations	SANDERS0002922	
P028				2015-10-09 St. Paul Sub Nightly Reports	SANDERS0002600	
P029				2015-11-01 Maintenance of Way Operating Rules	BNSF_Sanders0002909	
P030				2015-11-09 Email chain regarding Fw with attached photograph	SANDERS0001511	
P031				2015-11-09 Email regarding critical joints central ave	SANDERS0001510	

P032				2015-11-10 Email regarding main line	SANDERS0000054	
P033				2015-11-17 Email regarding Fwd.	SANDERS0000055	Foundation
P034				2015-11-18 Email chain regarding my day wensday,nov.11/2015	SANDERS0001513	
P035				2015-11-24 Email regarding my day tuesday nov 24/2015	SANDERS0000120	
P036				2015-12-01 Email chain regarding 1a stcroix shoulder and point	SANDERS0000133	
P037				2015-12-06 Email chain regarding my day Friday DEC. 4/2015	SANDERS0001592	
P038				2015-12-07 BNSF EEO/OSHA Charges/Internal Complaints Tracking System	BNSF_Sanders0007059	
P039				2015-12-07 Email regarding INTERNAL COMPLAINT: Don Sanders Discussion - December 7th	BNSF_Sanders0007029	
P040				2015-12-08 Email chain regarding my day Monday/12/7/2015 and the evening of 12/6/2015	BNSF_Sanders0007095	
P041				2015-12-10 Email chain regarding Tims weekly report Nov. 2015	SANDERS0000051	
P042				2015-12-11 Email chain regarding Mr. Sanders sent home....?	BNSF_Sanders0008148	
P043				2015-12-11 Email chain regarding my day monday/12/7/2015 and the evening of 12/6/2015	SANDERS0000135	
P044				2015-12-11 Email regarding my day Thursday Dec. 10/2015 with attached photographs	SANDERS0000056	
P045				2015-12-15 Email regarding 12-15-15 anti retaliation letter	BNSF_Sanders0007035	

P046				2015-12-15 Letter from Joseph Spier to Keith Jones regarding Retaliation Prohibited	BNSF_Sanders0007036	
P047				2015-12-16 Letter to Donald Sanders regarding Notification of Completion of the Investigation and Findings	BNSF_Sanders0007088	
P048				2015-12-22 Letter from Douglas Jensen to Keith Jones regarding Formal Coaching & Counseling	BNSF_Sanders0007051	
P049				2015-12-23 Email regarding Keith Jones CoachingandCounseling12-2015	BNSF_Sanders0007055	
P050				2015-12-23 Letter from Magenta Eggertsen to Donald Sanders regarding Notification of Completion of the Investigation and Findings	BNSF_Sanders0007039	
P051				2015-12-31 Engineering Scorecard for RDM-SUPERIOR	BNSF_Sanders0007578	Relevance
P052				2015-12-31 Engineering Scorecard for TWCEW	BNSF_Sanders0007556	Relevance
P053				2016-01-01 Performance and Development Review for Blaine Nicole Hoppenrath - 2016 - Mid-Year	BNSF_Sanders0013075	Hearsay Relevance
P054				2016-01-01 Performance and Development Review for Blaine Nicole Hoppenrath - 2016 - Year-End	BNSF_Sanders0013053	Hearsay Relevance
P055				2016-01-01 Performance and Development Review for Keith D Jones - 2016 - Mid-Year	BNSF_Sanders0013107	Hearsay Relevance
P056				2016-01-01 Performance and Development Review for Keith D Jones - 2016 - Year-End	BNSF_Sanders0013081	Hearsay Relevance
P057				2016 Scorecard Ranking	BNSF_Sanders0007635	Relevance

P058				2016 -Track - Year - NOMOW - GOMTC	BNSF_Sanders0011179	Relevance
P059				2016-01-04 Email regarding AS INFORMATION: Don Sanders Internal Complaint Closeout with attachment	BNSF_Sanders0007038	
P060				2016-01-05 Email regarding Sanders	BNSF_Sanders0007845	
P061				2016-01-06 Email chain regarding Sanders Recap 1/5/2015	BNSF_Sanders0006954	
P062				2016-01-08 Email chain regarding st. paul issues	SANDERS0000146	
P063				2016-01-11 Email chain regarding Start Time	BNSF_Sanders0008616	
P064				2016-01-11 Email chain regarding Wednesday 1/6/15	BNSF_Sanders0008617	
P065				2016-01-15 Email regarding my day Friday Jan. 15/2016	BNSF_Sanders0008154	
P066				2016-01-19 Email regarding Rule 38 jobs	BNSF_Sanders0008158	
P067				2016-01-20 Email regarding my day Wednesday Jan. 20/2016	BNSF_Sanders0008153	
P068				2016-01-26 Email regarding my day Monday Jan. 25, 2016 with attached photographs	BNSF_Sanders0008163	
P069				2016-01-26 Track Inspector Evaluation Form	BNSF_Sanders0006027	
P070				2016-01-26 Track Inspector Evaluation General Comments	BNSF_Sanders0007846	
P071				2016-01-31 Email chain regarding my day Saturday Jan. 30th 2016	SANDERS0000147	
P072				2016-01-31 Email chain regarding my day Saturday Jan. 30th 2016	BNSF_Sanders0007839	
P073				2016-02-05 Email regarding 2016 Merit - Keith Jones - Congratulations.	BNSF_Sanders0013051	Relevance
P074				2016-02-05 Merit Increase Statement -Keith Jones	BNSF_Sanders0013166	Relevance

P075				2016-02-10 Track Inspector Evaluation General Comments	BNSF_Sanders0007852	
P076				2016-02-24 Preventing Harassment and Discrimination PowerPoint	BNSF_Sanders0008493	
P077				2016-02-25 Email chain regarding Crossing safety	BNSF_Sanders0008146	
P078				2016-03-01 Email chain regarding Engr Scorecard Detail_3-1-16.xlsx with attachment	BNSF_Sanders0011178	Relevance
P079				2016-03-01 Email regarding 2016-03-01 Engr Scorecard Detail with attachments	BNSF_Sanders0011375	Relevance
P080				2016-03-02 Email regarding my day Tuesday Feb. 16/2016	BNSF_Sanders0008143	
P081				2016-03-09 Email regarding 2016-03-09 Engr Scorecard Detail with attachment	BNSF_Sanders0011399	Relevance
P082				2016-03-16 Email chain regarding Production Report RG302 3/14/2016 (New Rail)	BNSF_Sanders0011187	Relevance
P083				2016-03-16 Email regarding 2016-03-16 Engr Scorecard Detail with attachment	BNSF_Sanders0011383	Relevance
P084				2016-03-18 Track Inspector Evaluation Form	BNSF_Sanders0006035	
P085				2016-03-19 Email chain regarding my day Sunday March 19/2016	BNSF_Sanders0008120	
P086				2016-03-22 Email regarding AS INFORMATION: Donald Sanders - Internal Complaint Closeout	BNSF_Sanders0006952	
P087				2016-03-22 Letter to Donald Sanders regarding Notification of Completion of the Investigation and Findings	BNSF_Sanders0006953	
P088				2016-03-24 Email chain regarding company use	SANDERS00000048	
P089				2016-03-24 Email chain regarding company use	SANDERS00000008	

P090				2016-03-25 Email chain regarding my day March 25/2016	BNSF_Sanders0008127	
P091				2016-03-28 Letter to Donald Sanders	SANDERS0002768	
P092				2016-03-28 Letter to Donald Sanders	SANDERS0002766	
P093				2016-03-29 Email chain regarding Access Suspension	BNSF_Sanders0008547	
P094				2016-03-29 Email chain regarding Draft Notice #2	BNSF_Sanders0008544	
P095				2016-03-29 Email chain regarding Sanders Draft Notice #1	BNSF_Sanders0008545	
P096				2016-03-30 Email regarding 2016-03-30 Engr Scorecard Detail with attachment	BNSF_Sanders0011391	Relevance
P097				2016-04-01 Email from Christine Sanders	SANDERS0003599	Foundation Relevance
P098				2016-04-03 Investigation Transcript and Exhibits	BNSF_Sanders0000652	
P099				2016-04-05 EthicsPoint Incident Management Case: 2016-4-767 Hotline Phone	BNSF_Sanders0007541	
P100				2016-04-05 EthicsPoint Incident Management Case: 2016-4-767 Hotline Phone	BNSF_Sanders0007176	
P101				2016-04-06 Email regarding 2016-04-06 Engr Scorecard Detail with attachment	BNSF_Sanders0011407	Relevance
P102				2016-04-08 Email chain regarding Donald Sanders Complaint	BNSF_Sanders0006970	
P103				2016-04-08 Investigation Data Transcript and Exhibits	BNSF_Sanders0000838	
P104				2016-04-11 Email chain regarding Donald Sanders Complaint with attachment	BNSF_Sanders0006955	
P105				2016-04-12 Email regarding Hotline Statement RE: 2016-4-767	BNSF_Sanders0007446	



P106				2016-04-13 Email regarding 2016-04-13 Engr Scorecard Detail with attachment	BNSF_Sanders0011415	Relevance
P107				2016-04-16 Email chain regarding Derailment @ 28th Street - page	BNSF_Sanders0011193	Relevance
P108				2016-04-19 Email regarding Sanders TWI-MOW-2016-00277	BNSF_Sanders0006440	
P109				2016-04-19 Email regarding TWI-MOW-2016-00278	BNSF_Sanders0006615	
P110				2016-04-19 Email chain regarding Complaint Statement	BNSF_Sanders0007180	
P111				2016-04-19 Email chain regarding Follow up	SANDERS0003617	
P112				2016-04-19 Email chain regarding Sanders TWI-MOW-2016-00277	BNSF_Sanders0006438	
P113				2016-04-19 Email chain regarding Statement	BNSF_Sanders0007448	
P114				2016-04-20 Email chain regarding Fwd:	SANDERS0003630	
P115				2016-04-20 Email regarding 2016-04-20 Engr Scorecard Detail with attachment	BNSF_Sanders0011423	Relevance
P116				2016-04-20 Email regarding dates and some incidents	SANDERS0003624	
P117				2016-04-22 Email chain regarding Hot Line 2016-4-767	BNSF_Sanders0007171	
P118				2016-04-22 Email chain regarding Statement	BNSF_Sanders0007450	
P119				2016-04-22 Email chain regarding Summary of Witness statements	BNSF_Sanders0007168	
P120				2016-04-22 Email chain regarding TWI-MOW-2016-00278	BNSF_Sanders0006783	
P121				2016-04-26 Email chain regarding Follow up	SANDERS0003631	
P122				2016-04-27 Email chain regarding Sanders TWI-MOW-2016-00277	BNSF_Sanders0008112	

P123				2016-04-27 Email chain regarding TWI-MOW-2016-00278	BNSF_Sanders0008118	
P124				2016-04-27 Email regarding Engr Scorecard Detail 4-27-2016 with attachment	BNSF_Sanders0011431	Relevance
P125				2016-04-28 Email chain regarding Sanders - Draft Dismissals	BNSF_Sanders0008536	
P126				2016-04-28 Draft Letter to Donald Sanders regarding Dismissal	BNSF_Sanders0008537	
P127				2016-04-28 Draft Letter to Donald Sanders regarding Dismissal	BNSF_Sanders0008539	
P128				2016-04-29 Letter to Donald Sanders regarding Dismissal	BNSF_Sanders0001181	
P129				2016-04-29 Letter to Donald Sanders regarding Dismissal	BNSF_Sanders0001363	
P130				2016-05-02 Email chain regarding Follow up	SANDERS0003632	
P131				2016-05-03 Email chain regarding Follow up	SANDERS0003635	
P132				2016-05-03 Email chain regarding Follow up	SANDERS0003634	
P133				2016-05-12 Email chain regarding Keith Jones and Don Sanders	SANDERS0003643	
P134				2016-05-12 Email chain regarding track inspector		
P135				2016-05-21 Email chain regarding GEO CAR GDM EXCEPTION REPORT - 2016-05-20	BNSF_Sanders0011195	
P136				2016-05-25 Email chain regarding Engr Scorecard Detail 5-25-16	BNSF_Sanders0011197	Relevance
P137				2016-05-27 Email regarding voice message	SANDERS0003328	
P138				2016-06-01 Email chain regarding statement	SANDERS0003562	Foundation Relevance

P139				2016-06-21 Letter to Donald Sanders regarding telephone recordings	BNSF_Sanders0007467	
P140				2016-06-24 Email regarding I see you've moved into 3rd on the scorecard - congratulations - enjoy your weekend.	BNSF_Sanders0011198	Relevance
P141				2016-07-07 Letter from Chad Sundem to John Mozinski	BNSF_Sanders0008389	
P142				2016-07-18 Email chain regarding FYI	BNSF_Sanders0011199	Relevance
P143				2016-09-07 Email regarding Engr Scorecard Detail 09-07-16 with attachment	BNSF_Sanders0011226	Relevance
P144				2016-09-14 Email regarding Engr Scorecard Detail 09-14-16 with attachments	BNSF_Sanders0011239	Relevance
P145				2016-09-21 Email regarding Engr Scorecard Detail 09-21-16 with attachments	BNSF_Sanders0011252	Relevance
P146				2016-10-24 Email chain regarding Engr Scorecard Detail 10-19-16 with attachments	BNSF_Sanders0011200	Relevance
P147				2016-12-28 Email regarding 2016-12-28 Engr Scorecard Detail with attachments	BNSF_Sanders0011363	Relevance
P148				2016-12-31 Engineering Scorecard for RDM-SUPERIOR	BNSF_Sanders0007593	Relevance
P149				2016-12-31 Engineering Scorecard for TWIEA	BNSF_Sanders0007550	Relevance
P150				2017-01-01 YTD Scorecard	BNSF_Sanders0011687	Relevance
P151				2017-01-04 Email regarding Engr Scorecard Detail 01-04-2017 with attachments	BNSF_Sanders0011214	Relevance
P152				2017-01-11 Email regarding Engr Scorecard Detail 1-11-2017 with attachments	BNSF_Sanders0011694	Relevance

P153				2017-02-08 Email chain regarding Engr Scorecard Detail_02-08-2017	BNSF_Sanders0011616	Relevance
P154				2017-06-09 Email regarding Scorecard details	BNSF_Sanders0011585	Relevance
P155				2017-06-09 Email regarding Scorecard details	BNSF_Sanders0011685	Relevance
P156				2018-02-28 Employee Transcript	BNSF_Sanders0004763	Relevance
P157				2018-11-29 Email chain regarding Sanders v. BNSF (Depo Ex. 67)		Relevance
P158				2018-11-29 Letter regarding 30(b)(6) Testimony Designations (Depo Ex. 70)		Relevance
P159				2019-01-01 2019 Division Expectations	BNSF_Sanders0013165	Foundation Relevance
P160				Photographs	SANDERS0003703	Foundation Relevance
P161				Chartier Desk File Night Reports - Don Sanders	BNSF_Sanders0007803	
P162				Eggertsen Investigation Notes	BNSF_Sanders0007084	
P163				Eggertsen notes regarding Communication with Don Sanders	BNSF_Sanders0007104	
P164				Frequently Asked Questions about the BNSF Hotline	BNSF_Sanders0002898	
P165				Handwritten Notes and Calendar Entries (Depo Ex. 63)		
P166				Hoppenrath Instagram Profile Pages		Foundation Relevance
P167				Note regarding Keith		
P168				Note regarding tracking and handling defects		Foundation
P169				PEPA Case Write-Up	BNSF_Sanders0008586	
P170				Sanders Dismissal File	BNSF_Sanders0008481	
P171				Sanders Employee Safety Record Summary	BNSF_Sanders0004767	

P172				Sanders Employee Transcript	BNSF_Sanders0004763	
P173				Sanders Time History 10/2015 - 4/2016	BNSF_Sanders0004580	
P174				Sanders Wage History Report	BNSF_Sanders0004774	
P175				DS Audio Record		Foundation Relevance Cumulative
P176				Audio Recording	SANDERS0000006	Foundation Relevance Cumulative
P177				Sanders Recording no. DSanders0000000415	SANDERS0002528	Foundation Relevance Cumulative
P178				Sanders Recording no. DSanders0000000416	SANDERS0002541	Foundation Relevance Cumulative
P179				Sanders recording no. DSanders0000000417	SANDERS0002539	Foundation Relevance Cumulative
P180				Sanders recording no. DSanders0000000418	SANDERS0002529	Foundation Relevance Cumulative
P181				Sanders recording no. DSanders0000000419	SANDERS0002542	Foundation Relevance Cumulative
P182				Sanders recording no. DSanders0000000419 and transcript	SANDERS0002543	Foundation Relevance Cumulative
P183				Sanders recording no. DSanders0000000420	SANDERS0002531	Foundation Relevance Cumulative
P184				Sanders Recording no. DSanders0000000421	SANDERS0002545	Foundation Relevance Cumulative
P185				Sanders Recording no. DSanders0000000422	SANDERS0002547	Foundation Relevance Cumulative
P186				Sanders Recording no. DSanders0000000423	SANDERS0002540	Foundation Relevance Cumulative

P187				Sanders Recording no. DSanders0000000424	SANDERS0002549	Foundation Relevance Cumulative
P188				Sanders Recording no. DSanders0000000425	SANDERS0002534	Foundation Relevance Cumulative
P189				Sanders Recording no. DSanders0000000426	SANDERS0002546	Foundation Relevance Cumulative
P190				Sanders Recording no. DSanders0000000427	SANDERS0002530	Foundation Relevance Cumulative
P191				Sanders Recording no. DSanders0000000429	SANDERS0002526	Foundation Relevance Cumulative
P192				Sanders Recording no. DSanders0000000430 and transcript	SANDERS0002551	Foundation Relevance Cumulative
P193				Sanders Recording no. DSanders0000000431	SANDERS0002544	Foundation Relevance Cumulative
P194				Sanders Recording no. DSanders0000000432	SANDERS0002555	Foundation Relevance Cumulative
P195				Sanders Recording No. DSanders0000000433 and transcript	SANDERS0002533	Foundation Relevance Cumulative
P196				Sanders Recording no. DSanders0000000434	SANDERS0002557	Foundation Relevance Cumulative
P197				Sanders Recording no. DSanders0000000435	SANDERS0002537	Foundation Relevance Cumulative
P198				Sanders Recording no. DSanders0000000436	SANDERS0002559	Foundation Relevance Cumulative
P199				Sanders Recording no. DSanders0000000437	SANDERS0002556	Foundation Relevance Cumulative
P200				Sanders Recording no. DSanders0000000438	SANDERS0002548	Foundation Relevance Cumulative

P201				Sanders Recording no. DSanders0000000439	SANDERS0002562	Foundation Relevance Cumulative
P202				Sanders Recording no. DSanders0000000440	SANDERS0002554	Foundation Relevance Cumulative
P203				Sanders recording no. DSanders0000000441	SANDERS0002560	Foundation Relevance Cumulative
P204				Sanders Recording no. DSanders0000000443	SANDERS0002561	Foundation Relevance Cumulative
P205				Sanders Recording No. DSanders0000000444 and transcript	SANDERS0002550	Foundation Relevance Cumulative
P206				Sanders Recording no. DSanders0000000445	SANDERS0002552	Foundation Relevance Cumulative
P207				Sanders Recording No. DSanders0000000446 and transcript	SANDERS0002535	Foundation Relevance Cumulative
P208				Sanders Recording no. DSanders0000000447	SANDERS0002536	Foundation Relevance Cumulative
P209				Sanders Recording No. DSanders0000000448 and transcript	SANDERS0002532	Foundation Relevance Cumulative
P210				Sanders Recording No. DSanders0000000449	SANDERS0002538	Foundation Relevance Cumulative
P211				Sanders Recording no. DSanders0000000450	SANDERS0002525	Foundation Relevance Cumulative
P212				Sanders Recording no. DSanders0000000451	SANDERS0002527	Foundation Relevance Cumulative
P213				Sanders Recording no. DSanders0000000452 and transcript	SANDERS0002553	Foundation Relevance Cumulative
P214				Sanders Recording no. DSanders0000000453 and transcript	SANDERS0002563	Foundation Relevance Cumulative

P215				Sanders Recording no. DSanders0000000454	SANDERS0002558	Foundation Relevance Cumulative
P216				Sanders recording no. DSanders0000000455	SANDERS0002564	Foundation Relevance Cumulative
P217				Michael Metzinger discipline file	BNSF_Sanders0009 701	Relevance
P218				Josh Kramer discipline file	BNSF_Sanders0010 279	Relevance
P219				Michael Olson discipline file	BNSF_Sanders0010 745	Relevance
P220				Cameron Webb discipline file	BNSF_Sanders0011 145	Relevance
P221				Curtis Knutson discipline file	BNSF_Sanders0010 736	Relevance
P222				Select pages of Benjamin Klukas discipline file	BNSF_Sanders0010 285	Relevance
P223				James Johnson discipline file	BNSF_Sanders0010 740	Relevance
P224				2015-09-01 Table of Contents - Field Manual	SANDERS0000178	
P225				2015-06-01 Track Inspection Manual	SANDERS0000306	
P226				2014-12-01 Temporary Speed Restrictions Manual	SANDERS0000376	
P227				2012-01-01 PATS Manual	SANDERS0001146	
P228				2014-06-01 General Manual	SANDERS0001478	
P229				Don Sanders Text Messages with Blaine Hoppenrath	SANDERS0000154	
P230				Don Sanders Text Messages with Stephen Chartier	BNSF_Sanders0007 858	Foundation
P231				Dale Boisso Curriculum Vitae		
P232				Dale Boisso List of Testimony		
P233				Dale Boisso List of Files Reviewed		
P234				2008 Form W-2	SANDERS0004005	
P235				2011 Form W-2	SANDERS0003930	
P236				2012 Form W-2	SANDERS0003927	
P237				2013 Form W-2	SANDERS0003931	
P238				2014 Form W-2	SANDERS0002750	
P239				2014 Income Tax Return	SANDERS0003889	



P240				2014-12-31 The Railroad Employees National Health and Welfare Plan	BNSF_Sanders0002249	
P241				2015 Form W-2	SANDERS0002753	
P242				2015 Income Tax Return	SANDERS0003899	
P243				2015-01-01 BMWED Rates of Pay	BNSF_Sanders0002707	
P244				2016 Form 1099-R	SANDERS0002760	
P245				2016 Form 1099-R	SANDERS0002761	
P246				2016 Form W-2	SANDERS0002758	
P247				2016 Income Tax Return	SANDERS0003911	
P248				2017 Income Tax Return	SANDERS0003932	
P249				2017 First Transit Earnings Statement	First.Transit_Sanders_000001	
P250				2017 Form M1 Individual Income Tax Return	SANDERS0003938	
P251				2017 Form W-2	SANDERS0003928	
P252				2017 Form W-2	SANDERS0003929	
P253				2017 Form W-2	SANDERS0003925	
P254				2017 Form W-2	SANDERS0003926	
P255				2017-03-10 Letter regarding BMWED Cash and Non-Cash Compensation as of January 1, 2017	SANDERS0003947	
P256				2017-12-12 Letter regarding BMWED Cash and Non-Cash Compensation as of January 1, 2018	SANDERS0003981	
P257				2017-12-28 Emerald Builders, Inc. Employee Earnings Records	Emerald.Builders_Sanders_000001_00001	
P258				2018 Form 1099-INT	SANDERS0004059	
P259				2018 Form W-2	SANDERS0004060	
P260				2018 Form W-2	SANDERS0004061	
P261				2018 Form W-2	SANDERS0004062	
P262				2018 Form W-2	SANDERS0004063	
P263				2018 Schedule M1W Minnesota Income Tax Withheld	SANDERS0004054	
P264				2018 Paystubs Oak Grove Capital	SANDERS0003944	

P265				2018-08-06 Your Social Security Statement	SANDERS0003977	
P266				2018-09-30 Oak Grove Capital, Inc Employee Earnings Record	Oak.Grove.Realty_Sanders_000001_00001	
P267				2018-10-04 Letter from Vannelli's by the Lake	Vannellis_Sanders_000001	
P268				2018-12-31 Minnesota Laborers Health and Welfare Fund Summary of Benefits and Coverage	SANDERS0003984	Relevance
P269				2018-2019 Oak Grove Realty Services Benefits Guide	SANDERS0003958	
P270				2019-02-22 Paystub	General.Contractors.Of.Minnesota_Sanders_000001_00002	
P271				Washington Prime Group Paystubs	Washington.Prime.Group_Sanders_00001_000027	
P272				Minnesota Laborers Health and Welfare Fund Summary of Material Modification	SANDERS0003990	Relevance
P273				RRB Earnings Report and Summary of Benefit Payments	RRB_0000000001	
P274				Social Security Estimated Benefits.	SANDERS0003955	
P275				Social Security Statement, Earnings Record, My Home, my Social Security	SANDERS0003952	
P276				Defendant BNSF Railway Company's Answers to Plaintiff Don Sanders' Interrogatories to Defendant		
P277				Defendant BNSF Railway Company's Objections and Answers to Plaintiff Don Sanders' Interrogatory to Defendant		
P278				Physical Copy of Track Safety Standards Part 213		

P279				Physical Copy of BNSF Engineering Instructions Manual		
P280				2015-07-10 Letter to Ross Schenk regarding Level S Actual Suspension	BNSF_Sanders0009704	Relevance
P281				Defendant BNSF Railway Company's Responses to Plaintiff Don Sanders' Request for Production of Documents to Defendant, Set I		
P282				Defendant BNSF Railway Company's Responses to Plaintiff Don Sanders' Request for Production of Documents to Defendant, Set II		
P283				2016 BNSF Form 10-K		Relevance
P284				Mann Companies Paystubs	SANDERS0005299	
P285				2020 Form W-2	SANDERS0005315	
P286				49 C.F.R. § 213.241		Relevance
P287				2019 Form W-2s and 1099	SANDERS0004305	

Plaintiff reserves the right to amend and supplement this Exhibit List to include inadvertent omissions, demonstrative exhibits and documents to be used for impeachment and/or rebuttal up until and through the trial of this case.

Respectfully Submitted:

Dated: November 17, 2021

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